



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 30 2015

REPLY TO THE ATTENTION OF:  
WU-16J

**CERTIFIED INTERNATIONAL MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Duncan Hamilton  
Energex Petroleum, Inc.  
2105 Victoria Avenue  
Windsor, ON N8X 1P8  
Canada

**Re: Additional Information for the Underground Injection Control Permit Application  
#MI-125-2R-0003, Lanphar 1-12 Injection Well**

Dear Mr. Hamilton:

On April 7, 2015, EPA received a permit application from Energex Petroleum, Inc. for the Lanphar 1-12 injection well. The following additional information is necessary to continue evaluating the application:

**Appendix Q: Plugging and abandonment plan**

- Submit a revised plugging and abandonment plan and a revised plugging schematic which have consistent information (forms enclosed). Information on these forms affects EPA's determination of adequate plugging. The information in the application is inconsistent, however, and therefore not useable. For example, the original construction schematic lists the intermediate casing depth as 2532 feet; the plugging schematic lists the intermediate casing depth as 2510 feet. In addition, the plug depths listed on the plugging schematic differ from the depths on the related Plugging and Abandonment Plan form.
- Provide an independent third-party plugging cost estimate.

**Appendix O: Plans for well failures**

- Submit a revised plan for well failure that describes plans in the event of well failure or shut-in. The current plan in the application reiterates operating and construction features to prevent well failure without describing well shut-in.
- Describe whether or not an alarm system will be installed to signal potential well failure or over-pressure injection.

Appendix R: Necessary resources

- To use a state bond, the applicant needs to submit the enclosed letter. A copy of the letter is also available online at: <http://www.epa.gov/r5water/uic/forms/letter-request-mich-state-bond-201404.pdf>.
- Send a copy of the state bond with the letter.
- Whenever a state blanket bond is used as a financial mechanism to cover the cost of plugging the well, the permittee is required to provide a list of all wells covered by the bond (producers and injectors) and the estimated plugging cost for each well. (The list is sometimes called a Schedule A list.) EPA will accept state blanket bonds covering at least 75% of the actual cost to plug and abandon all the wells listed under the bond.

Further information on application requirements and guidance to well operators can be found on our website at <http://www.epa.gov/r5water/uic/techdocs.htm#permits>. An example of appendix information is at <http://www.epa.gov/r5water/uic/forms/act-samp.pdf>.

Once EPA receives the information and determine that it is sufficient for a permitting decision, EPA will resume reviewing the application to make a draft decision. If you have any questions regarding the requested information, feel free to contact Anna Miller of my staff at (312) 886-7060 or [miller.anna@epa.gov](mailto:miller.anna@epa.gov).

Sincerely,



Stephen M. Jann, Chief  
Underground Injection Control Branch

Enclosures

cc: Mark Snow, Michigan DEQ

Underground Injection Control Branch  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard, WU-16J  
Chicago, Illinois 60604-3590  
To Whom It May Concern:

This letter requests that the attached State Bond # \_\_\_\_\_ in the amount of \$ \_\_\_\_\_ be considered an acceptable mechanism for meeting the Federal Underground Injection Control program financial responsibility requirement for the following well:

1. Well Name \_\_\_\_\_
2. Well Location: Township \_\_\_\_\_ Range \_\_\_\_\_  
Section \_\_\_\_\_ 1/4 Section \_\_\_\_\_  
County \_\_\_\_\_
3. UIC Application # \_\_\_\_\_
4. Owner/Operator Name \_\_\_\_\_
5. Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
6. Phone (\_\_\_\_\_) \_\_\_\_\_

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)

\_\_\_\_\_  
Name and Official Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date Signed

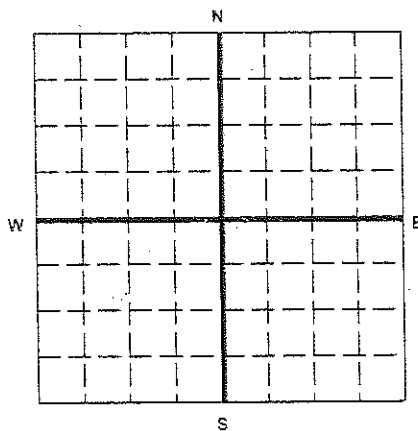



 United States Environmental Protection Agency  
 Washington, DC 20460

# PLUGGING AND ABANDONMENT PLAN

Name and Address of Facility

Name and Address of Owner/Operator

 Locate Well and Outline Unit on  
 Section Plat - 640 Acres


State

County

Permit Number

Surface Location Description

1/4 of 1/4 of 1/4 of 1/4 of Section Township Range

Locate well in two directions from nearest lines of quarter section and drilling unit

Surface

Location ft. from (N/S) Line of quarter section

and ft. from (E/W) Line of quarter section.

## TYPE OF AUTHORIZATION

- ☐ Individual Permit  
☐ Area Permit  
☐ Rule

Number of Wells

## WELL ACTIVITY

- ☐ CLASS I  
☐ CLASS II  
☐ Brine Disposal  
☐ Enhanced Recovery  
☐ Hydrocarbon Storage  
☐ CLASS III

Lease Name

Well Number

## CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT (LB/FT)	TO BE PUT IN WELL (FT)	TO BE LEFT IN WELL (FT)	HOLE SIZE

## METHOD OF EMPLACEMENT OF CEMENT PLUGS

- ☐ The Balance Method  
☐ The Dump Bailer Method  
☐ The Two-Plug Method  
☐ Other

## CEMENTING TO PLUG AND ABANDON DATA:

	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inches)							
Depth to Bottom of Tubing or Drill Pipe (ft)							
Sacks of Cement To Be Used (each plug)							
Slurry Volume To Be Pumped (cu. ft.)							
Calculated Top of Plug (ft.)							
Measured Top of Plug (if tagged ft.)							
Slurry Wt. (Lb./Gal.)							
Type Cement or Other Material (Class III)							

## LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS AND INTERVALS WHERE CASING WILL BE VARIED (If any)

From	To	From	To

Estimated Cost to Plug Wells

## Certification

I certify under the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)

Name and Official Title (Please type or print)

Signature

Date Signed

